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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ORACLE USA, INC., a Colorado corporation;  
ORACLE AMERICA, INC., a Delaware  
corporation; and ORACLE INTERNATIONAL  
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;  
SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-0106-LRH-PAL

**DECLARATION OF ROBERT H.  
RECKERS IN SUPPORT OF  
DEFENDANTS RIMINI STREET, INC.  
AND SETH RAVIN'S OPPOSITION TO  
ORACLE'S MOTION TO EXCLUDE  
TESTIMONY OF DEFENDANTS'  
EXPERTS**

Trial Date: September 14, 2015

**DECLARATION OF ROBERT H. RECKERS**

I, Robert H. Reckers, have personal knowledge of the facts stated below and, under penalty of perjury hereby declare:

1. I am an attorney admitted to practice *pro hac vice* before this Court in the above-captioned matter, and I am an attorney at Shook, Hardy, and Bacon LLP, attorneys for Defendants Rimini Street, Inc. and Seth Ravin (“Defendants”). I make this declaration in support of Defendants’ Opposition to Oracle’s Motion to Exclude Testimony of Defendants’ Experts. The exhibits referenced below are attached to this declaration.

2. Attached as **Exhibit A** is a true and correct copy of excerpts from the deposition of Scott Hampton taken in this matter on May 25, 2012. **(Filed under seal)**

3. Attached as **Exhibit B** is a true and correct copy of excerpts from the deposition of Brooks Hilliard, taken in this matter on June 5, 2012. **(Filed under seal)**

4. Attached as **Exhibit C** is a true and correct copy of excerpts from the deposition of Krista Williams, taken in this matter on October 5, 2011. **(Filed under seal)**

5. Attached as **Exhibit D** is a true and correct copy of excerpts from the deposition of James Benge, taken in this matter on June 21, 2012. **(Filed under seal)**

6. Attached as **Exhibit E** is a true and correct copy of a Memorandum Opinion and Order issued by Judge M. Christina Armijo, United States District Judge, on September 30, 2010 in the case *Summit Electric Supply Co. vs. International Business Machines Corp.*, Case No. CIV 07-431 MCA/DJS, in the United States District Court for the District of New Mexico. I obtained the Order from PACER, where it appears as docket entry 233.

7. Attached as **Exhibit F** is a true and correct copy of excerpts from the deposition of David Klausner, taken in this matter on June 15, 2012. **(Filed under seal)**

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on August 14, 2015.

/s/ Robert H. Reckers  
Robert H. Reckers, Esq.